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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91206463
Party	Defendant RICH C. YOUNG
Correspondence Address	RICH C YOUNG 333 WEST GARVEY AVE , SUITE 806 ROSEMEAD, CA 91754 UNITED STATES rcy2001@gmail.com
Submission	Other Motions/Papers
Filer's Name	/Rich C. Young/
Filer's e-mail	rcy2001@gmail.com
Signature	/Rich C. Young/
Date	06/01/2013
Attachments	TRADEMARK_OPPO 91206463 bhpc interrogatories 2013-06-01.pdf(250250 bytes )

BHPC ASSOCIATES LLC,	}
	}
Opposer	}
	}
v/s	}
	}
	}
YOUNG, RICH C.	}
	}
Applicant	}
	}

Interrogatory No. 2:

Identify each individual, and each officer, director, employee or agent of Applicant who was or is responsible for, or who participated in, the plans and decisions regarding the adoption and/or use of an image of polo player as part of Applicant's Mark.

Response: We are in intent to use status; We don't manufactured and use the Applicant's Mark in the market place yet.

Interrogatory No. 3:

Describe in detail all past and existing relations, including contracts, agreements, licenses, assignments, or other relations, between Applicant and any third party, including predecessor companies, related, or affiliated companies, relating in any manner of Applicant's Mark.

Response: We are not doing any business yet, we are in intent to use status, so We don't signs and any contract yet.

Interrogatory No. 4:

With respect to Applicant's Mark, identify the person or person responsible for the sales, advertising and sales promotion, licensing, and assignment or other transfer of rights.

Response: We are in intent to use status; We don't have any business activities yet.

Interrogatory No.5:

Identify all state and Federal registrations, applications for registration, and uses by Applicant or any third party of any mark which incorporates or includes an image of polo player, and for each such registration, application, and use, identify all documents relating thereto.

Response: Applicant has filed an application with US. Patent and Trademark Office Serial No. 85477199, date Nov 19, 2011 now in intent to use status. So Applicant don't use the Mark yet, therefore no any of use of Applicant's image of polo player yet.

Interrogatory No. 6:

Identify and describe each of the goods on which Applicant's Mark has used or is intended to be used.

Response: Applicant doesn't have any business activities yet.

Interrogatory No. 7:

Identify and describe each of the goods on which Applicant's Mark has been used or is intended to be used in commerce

Response: Applicant doesn't open the business yet. So Applicant's Mark not has been used or is intending to use in commerce.

Interrogatory No. 8:

Identify all documents and set forth with specificity all facts regarding the selection of Applicant's Mark including, without limitation, the circumstances and method by which Applicant adopted an image of a polo player as a part of Applicant's Mark.

Response: Applicant doesn't have any business open yet.

Interrogatory No. 9:

Identify all manufacturers of goods bearing Applicant's Mark.

Response: Applicant doesn't open any business yet.

Interrogatory No. 10:

For each of the goods identified in the Opposed Application, identify all documents supporting the date on which the mark was first use.

Response: Applicant doesn't have any business yet. So Applicant doesn't use the Applicant Mark yet.

Interrogatory No. 11:

For each of the goods identify in the Opposed Application, identify all documents supporting the date on which the mark was first used in commerce.

Response: We are in intent to use status; We don't have any use of the Mark in commerce yet.

Interrogatory No. 12:

Identify each different sign, display, point-of-sale display, label, hangtag, wrapper, container, package, advertisement, brochure, promotional material, and the like, known to Applicant which contains or bears Applicant's Mark and which has been used or disseminated in commerce by Applicant or by his or its licensee.

Response: We don't open for business yet, so we don't have any sign, display, label, container, etc. made yet.

Interrogatory No. 13:

With respects to the use or intended use of Applicant's mark in commerce, identify the following documents:

- A) All business and/or marketing plans.
- B) All correspondence with third party manufacturers and/or vendors, and
- C) All internal memoranda and/or email correspondence regarding specific plans to produce and/or launch products in commerce identified by Applicant's Mark.

Response: We are not open any business yet, so We don't have any activity regarding on the above mention questions.

Interrogatory No. 14:

Has Applicant or any one on behalf of Applicant ever licensed or permitted or had negotiation to license or permit, or otherwise granted right to third party to use Applicant's Mark or any mark including an image of polo player as a component? If so, identify the party or parties who have received or sought such license or permission or other right, state the nature and extent of any such license or permitted use or right, given or negotiated, and identify and describe all documents comprising or containing any such license, permission, or other right, or any agreement in respect to such mark.

Response: Applicant doesn't open for business yet, so Applicant doesn't have any activities as mention on above.

Interrogatory No. 15:

State whether Applicant had a bona fide intent to use Applicant's Mark in commerce on shirts on the date on which the Opposed Applicant was filed.

Response: Applicant doesn't open for business yet, so Applicant doesn't have any activity yet.

Interrogatory No. 16:

Set forth in detail each fact which supports or tends to support the claim that Applicant had a bona fide intent to use Applicant's Mark in commerce on shirt on the date on which the Opposed Application was filed.

Response: Applicant doesn't open for business yet, so Applicant doesn't have any use of Mark.

Interrogatory No. 17:

State the channels of trade in which Applicant's Mark is, has been or is intended to be used and/or in which goods bearing Applicant's Mark are, have been or are intended to be sold.

Response: We don't open for business yet, so we don't have any activity as mention on above.

Interrogatory No. 18:

Identify with specify the marketing methods used or intended to be used in the advertising and/or sale of goods under Applicant' Mark.

Response: We don't open for the business yet, so we don't have any activity as mention on above.

Interrogatory No. 19:

Identify each non-expert witness that Applicant expects to testify, the subject matter on which the witness is expected to testify, each fact and/or opinion to which the witness is expected to testify, the bases for each opinion and identify all documents that relate in any way to the subject matter, facts, and/or circumstance as to which the witness is expected to testify.

Response: Applicant not opens for business yet, so Applicant doesn't have any activity as mention on above.

Interrogatory No. 20:

Identify each person who participated in or supplied information used in answering any of the above interrogatories; beside the name of each such person, stat the number of the interrogatory answer(s) with respect to which that person participated in or supplied information.

Response: The person answered the interrogatories and supplied the information is Mr. Rich C. Young only.

Dated: 1 June 2013

Respectfully Submitted

By: \_\_\_\_\_Rich C. Young\_\_\_\_\_  
Rich C. Young  
333 W. Garvey Ave, Suite 806  
Monterey Park, CA 91754  
Tel: 626-289-8822  
Email: [rcy2001@gmail.com](mailto:rcy2001@gmail.com)

CERTIFICATE OF SERVICE

I hereby certify that a true and completed copy of the foregoing response to Opposer's First Set of Interrogatories to Opposer EPSTEIN DRANGEL LLP was served by First Class Mail, with sufficient postage prepaid.

Dated: 1 June 2013.

EPSTEIN DRANGEL LLP  
Robert L. Epstein  
60 East 42<sup>nd</sup> Street  
New York, NY 10165

By: \_\_/Rich C. Young/\_\_\_\_  
Rich C. Young  
333 W. Garvey Ave, Suite 806  
Monterey Park, CA 91754  
Tel: 626-289-8822  
Email: rcy2001@gmail.com